



Modern Slavery Statement for the year ending 31 March 2023

Commitment

The Clearway Group Limited and its subsidiaries (“**Group**” or “**us**” or “**we**”) are committed to operating ethically and with integrity. It is our priority to improve our practices to combat slavery and human trafficking in our business and our supply chain. This statement sets out the steps we are taking to enhance our anti-slavery and human trafficking practices.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps that we have taken to identify and reduce the risk of modern slavery occurring within our supply chain and business operations.

Organisation

We are one of the leading UK companies of vacant property security, safety and analytics, highways CCTV, mobile security devices and monitoring services to commercial customers. Our Group’s head office is in Penway Place, London. The Group consists of app. 16 independent companies with the total workforce of circa 600 employees. We operate in England, Scotland, France, Germany, Austria and Switzerland.

Our business

The Group operates via independent companies, which enter into contracts in their own capacity. There is no centralised procurement function developed yet.

Our supply chain

The Group spends circa £55m a year with suppliers and sub-contractors, giving business to thousands of SMEs across the countries where we operate. Our suppliers and sub-contractors deliver a broad range of goods and services such as electronic equipment, uniforms, components for our CCTV towers, or temporary labour. Our risk assessment process has identified a small number of key categories as a potentially higher risk of exposure to modern slavery. Those are:

- (a) temporary low-skilled or unskilled labour
- (b) manufacture of electronic equipment and uniforms.

How we manage modern slavery

In 2024 we developed and rolled out across our units the risk assessment forms to identify potential areas of vulnerability in our supply chain.

To ensure a high level of understanding of the risks of modern slavery and human trafficking we provide training to all our staff on modern slavery, money laundering and ethical behaviour.

The sub-contractors to the Group are expected to deliver their goods and/ or services on our standard sub-contractor terms. We scrutinize suppliers’ standard terms to ensure compliance with our policies and procedures and that they are committed to ethical labour practices. We include anti-slavery and human tracking provisions in our contracts.

Our policies

Our Anti-Slavery and Human Trafficking Policy sets out our responsibilities, and those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking. It also provides information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

Our Ethics Policy outlines our values and expectations for ethical behaviour. It serves as a guide for all persons working for the Group to ensure actions align with the Group's mission and legal obligations. The policy addresses conflicts of interest, proper conduct, compliance, and reporting unethical behaviour.

We have established robust recruitment processes in line with relevant employment legislation including 'right to work' document checks, contracts of employment and checks to ensure everyone employed is 16 and above. We only employ agency workers through reputable employment agencies that adhere to our anti-slavery and human trafficking policy.

Our Whistleblowing Policy encourages staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. Provide staff with guidance as to how to raise those concerns; and reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

Effectiveness of Our Actions

We will review the effectiveness of our actions annually and make necessary adjustments to ensure ongoing compliance with modern slavery and human trafficking legislation.

Approved by the board on 18 December 2024.



Mel Jeczelewska
General Counsel and Group Company Secretary